## [PROPOSED] ORDER

GOOD CAUSE SHOWN, IT IS HEREBY ORDERED that Defendant Jimmy Alejandro Jarquin's request for modification of bond is granted.

IT IS FURTHER ORDERED that Mr. Jarquin shall be allowed to travel to Carson, California to compete in a Jiu Jitsu Tournament from September 6, 2013 through September 8, 2013; and travel to Long Beach, California to compete in a Jiu Jitsu Tournament from from October 4, 2013 through October 6, 2013.

IT IS FURTHER ORDERED that Mr. Jarquin shall provide Pretrial Services with a detailed itinerary of his travel arrangements as well as a contact address and telephone number while traveling.

IT IS FURTHER ORDERED that all other terms and conditions of pretrial supervision remain in effect.

IT IS SO ORDERED.

DATED: \$\\30\13

THE HONORABLE JOSEPH C. SPERO United States District Magistrate Judge

[PROPOSED] ORDER MODIFYING CONDITIONS OF RELEASE 3:12-CR-00406-MMC (JCS)-1 2

## Case3:1.2-ct-100/46-MMMC Document92:1 Filed08/20713 Page120f26

1 2 3 4 5 6 7 8	BRIAN A. NEWMAN for OKABE & HAUSHALTER 225 Avenue I, Suite 201 Redondo Beach, California 90277 (310) 316-6622; Fax (310) 316-5511 email: jjnewbee@sbcglobal.net CA State Bar #89975 MARK HAUSHALTER for OKABE & HAUSHALTER 225 Avenue I, Suite 201 Redondo Beach, California 90277 (310) 543-7708; Fax (310) 316-2306 email: southbaylawyer.com CA State Bar #208935 Attorneys for Defendant Jimmy Alejandro Jarquin		
10	UNITED STATES DISTRICT COURT		
11	NORTHERN DISTRICT OF CALIFORNIA		
12	SAN FRANCISCO DIVISION		
13			
14	UNITED STATES OF AMERICA, ) CR No. 3:12-CR-00406-MMC (JCS)-1		
15	Plaintiff, )		
16	) [PROPOSED] ORDER MODIFYING V. ) CONDITIONS OF RELEASE		
17	JIMMY ALEJANDRO JARQUIN, )		
18	Defendant. )		
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	[PROPOSED] ORDER MODIFYING CONDITIONS OF RELEASE 3:12-CR-00406-MMC (JCS)-1		

numerous occasions without incident.

8. Mr. Jarquin agrees to provide Pretrial Services with a detailed itinerary and to obey all of their rules and regulations.

I declare under penalty of perjury that the aforementioned is true and correct and if called as a witness I could testify competently thereto.

Dated this 28th day of August, 2013 at Redondo Beach, California.

/S/ BRIAN A. NEWMAN

STIPULATION MODIFYING CONDITIONS OF RELEASE 3:12-CR-00406-MMC (JCS)-1 4

DECLARATION OF BRIAN A. NEWMAN

I, BRIAN A. NEWMAN declare:

- 1. I am licensed to practice law before this court, the United States District Court for the Northern District of California, and all courts in the State of California.
- 2. I am an attorney of record for Defendant
  Jimmy Alejandro Jarquin in an action in the United States
  District Court for the Northern District of California.
- 3. Mr. Jarquin has contacted counsel with regard to traveling to Carson, California to compete in a Jiu Jitsu Tournament from September 6, 2013 through September 8, 2013; and regarding traveling to Long Beach, California to compete in a Jiu Jitsu Tournament from from October 4, 2013 through October 6, 2013.
- 4. Mr. Jarquin would travel via automobile with colleagues and stay at a local hotel for the September travel and via commercial airline and stay at a local hotel for the October travel.
- 5. On August 28, 2013 Assistant United States Attorney Kevin Barry was notified with regard to this request. Mr. Barry informed this Declarant that he has no objection and authorized this Declarant to sign his name to this Stipulation.
- 6. On August 28, 2013 United States Pretrial Services
  Officer Josh Libby was left a detailed voicemail message with
  regard to this request. As of this date he has not informed this
  Declarant as to his position to this request.
  - 7. Mr Jarquin has been granted permission to travel on

STIPULATION MODIFYING CONDITIONS OF RELEASE 3:12-CR-00406-MMC (JCS)-1 3

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Mr. Jarquin would travel via automobile with colleagues and stay at a local hotel for the September travel and via commercial airline and stay at a local hotel for the October travel.

All other terms and conditions would remain in effect.

On August 28, 2013, Assistant United States Attorney Kevin Barry informed the undersigned that he has no objection to this request and authorized the undersigned to sign his name to this Stipulation.

On August 28, 2013 United States Pretrial Services Officer
Josh Libby was contacted with regard to this request. As of this date, Mr. Libby has not informed the undersigned assistant as to his position regarding the request. It should be noted that Mr. Jarquin has been allowed to travel without incident on numerous occasions.

SO STIPULATED:

DATED: August 28, 201	יעטית.	013
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DATED: August 28, 2013

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BRIAN A. NEWMAN

Attorney for JIMMY ALEJANDRO JARQUIN

MELINDA HAAG

United States Attorney

<u>Kévin, J. Bar</u>

Assistant United States Attorney

[VIA EMAIL AUTHORIZATION]

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BRIAN A. NEWMAN for

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8
    Attorneys for Defendant Jimmy Alejandro Jarquin
                       UNITED STATES DISTRICT COURT
                       NORTHERN DISTRICT OF CALIFORNIA
                          SAN FRANCISCO DIVISION
12
13
    UNITED STATES OF AMERICA,
                                     CR No. 3:12-CR-00406-MMC (JCS)-1
14
       Plaintiff,
15
                                     STIPULATION AND [PROPOSED] ORDER
                                     MODIFYING CONDITIONS OF RELEASE
      V.
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    JIMMY ALEJANDRO JARQUIN,
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         Defendant.
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        IT IS HEREBY STIPULATED BY AND BETWEEN Brian A. Newman,
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attorney for Defendant Jimmy Alejandro Jarquin and Assistant United States Attorney Kevin Barry that Mr. Jarquin's conditions of bond be modified, specifically that he be allowed to travel to Carson, California to compete in a Jiu Jitsu Tournament from September 6, 2013 through September 8, 2013; and travel to Long Beach, California to compete in a Jiu Jitsu Tournament from from October 4, 2013 through October 6, 2013.

STIPULATION MODIFYING CONDITIONS OF RELEASE 3:12-CR-00406-MMC (JCS)-1